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January 23, 2020

The Honorable Katherine M. Perhach
517 East Wisconsin Ave.
Milwaukee, WI 53202

Re: Letter to Renew Motion for Relief
Charles Andrew Hoffkins and Suzanna Marie Hoffkins
Case No. 15-30114-kmp
Chapter 13

Dear Judge Perhach,

On December 4, 2015, this court entered an Order Approving Stipulation (DE 37), providing for a renewal of the Motion for Relief from Stay filed by BSI as the authorized servicer for US Bank Trust National Association as Trustee of Cabana Series III Trust ("US Bank") a corporation organized and existing under the laws of the United States of America, in the event of a future default in payments by the debtors.

We now wish to renew that Motion. As of January 22, 2020, the post-petition mortgage payments are due for October 01, 2019 through January 01, 2020, each in the amount of \$1,585.54, minus suspense of \$862.44, in the total amount of \$5,479.72. By this letter, we are informing the parties listed below of the default. If any party wishes to object to this renewed Motion, they must file a written objection with the court within 14 days of the date of this letter. In the case an Objection is filed, we request that the matter be set for hearing. In the absence of a timely objection, we will submit an Affidavit of No Objection and proposed Order granting the Motion.

Very Truly Yours,

/s/Michael Dimand
Attorney for Secured Creditor

CERTIFICATE OF SERVICE

The undersigned certifies that the above instrument was filed electronically with the Court on January 23, 2020, and that he has determined that the following person(s) are registered with the Court for electronic filing, and, therefore, will be sent a copy of the pleading by the Court:

Scott Lieske
Chapter 13 Trustee
ecf@chapter13milwaukee.com

Anton B. Nickolai, William Patrick Nickolai,
Attorney for Debtors
anton@nickolailaw.com and bill@nickolailaw.com

U.S. Trustee
ustpreion11.mi.ecf@usdoj.gov

I further certify that on January 23, 2020, I deposited a copy of the foregoing in a U.S. Post Office Box, enclosed in an envelope with proper postage pre-paid, and addressed to the following in the manner set forth:

Charles Andrew Hoffkins
705 Cobb Road
Elkhorn, WI 53121

Suzanna Marie Hoffkins
705 Cobb Road
Elkhorn, WI 53121

/s/Michael Dimand
Marinosci Law Group, P.C.

Marinosci Law Group, P.C.
134 N. LaSalle Street; Suite 1900
Chicago, IL 60602
312-940-8580; (f) 401-262-2114
ILWIBK@mlg-defaultlaw.com



THE FOLLOWING ORDER
IS APPROVED AND ENTERED
AS THE ORDER OF THIS COURT:

DATED: December 3, 2015


Susan V. Kelley

Chief United States Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT FOR THE
EASTERN DISTRICT OF WISCONSIN

IN RE

Charles Andrew Hoffkins aka CA Hoffkins and
Suzanna Marie Hoffkins aka Susan Marie Hoffkins
aka Suzanna M. Schultz

Chapter: 13

Case No. 15-30114-svk

Debtors.

**ORDER PURSUANT TO HEARING UPON MOTION OF THE BANK OF NEW YORK
MELLON TRUST COMPANY, NATIONAL ASSOCIATION FKA THE BANK OF NEW YORK
TRUST COMPANY, N.A. AS SUCCESSOR TO JPMORGAN CHASE BANK, AS TRUSTEE
FOR RESIDENTIAL ASSET MORTGAGE PRODUCTS, INC., MORTGAGE ASSET-BACKED
PASS-THROUGH CERTIFICATES, SERIES 2003-RS11 FOR RELIEF FROM THE
AUTOMATIC STAY AND ABANDONMENT**

Pursuant to the motion of The Bank of New York Mellon Trust Company, National Association fka The Bank of New York Trust Company, N.A. as successor to JPMorgan Chase Bank, as Trustee for Residential Asset Mortgage Products, Inc., Mortgage Asset-Backed Pass-Through Certificates, Series 2003-RS11 the current mortgagee of record, its successors, servicing agents and/or assignees (hereinafter collectively and at all times material hereto "the movant") for an order for relief from the automatic stay and abandonment with respect to the property located at 705 Cobb Rd, Elkhorn, WI 53121-9475, this matter was heard on December 1, 2015, the movant appearing through its counsel, Gray & Associates, L.L.P., by Jay Pitner, and the debtor(s) appearing through Nickolai & Poletti, LLC, by Anton B. Nickolai,

Drafted by:

Jay Pitner
Gray & Associates, L.L.P.
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and Christopher Schimke appearing on behalf of the Chapter13 trustee and upon the arguments and statements of counsel and all the files, records and proceedings herein,

IT IS HEREBY ORDERED that the motion is denied subject to the following terms and provisions of this order.

IT IS FURTHER ORDERED that commencing in December 2015, the debtors shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may request by letter another hearing upon the motion for relief from the automatic stay and abandonment.

IT IS FURTHER ORDERED that pending further notice, the amount of the monthly mortgage payment is \$1,258.85 and payments shall be made to the movant at Ocwen Loan Servicing, LLC, 1661 Worthington Road, Suite 100 West Palm Beach, FL 33409.

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